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The Honorable Amy M. Baggio

Attorney for Defendant Logan Krochalis

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

MAREESA M. BARRETT, individually,

Plaintiff,

v.

OREGON DEPARTMENT OF HUMAN SERVICES; FARIBORZ PAKSERESHT, Director, Oregon Department of Human Services in his official capacity; APRILLE FLINT-GERNER, Director Child Welfare Division in her official capacity; MO GLENN, Director Oregon Governor's Advocacy Office; WENDY POLZEL, Child Protection Services Supervisor in her official and individual capacities; JILLIAN KENNEDY, ODHS Child Welfare Permanency Worker in her official and individual capacities; CHRISTINA SUSTRIK, Child Welfare Supervisor in her official and individual capacities; DARIN MANCUSO, Former Foster Care Ombudsman in his official and individual capacities; DONDREA ELMQUIST in her official and individual capacities; LOGAN KROCHALIS, in her official and individual capacities; and SYBILLE BAER, Assistant Attorney General in her official and individual capacities,

Defendants.

Case No.: 3:24-cv-1483-AB

DECLARATION OF SHERI C. BROWNING IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT BY DEFENDANT LOGAN KROCHALIS

I, Sheri C. Browning, state as follows:

1. I represent defendant Logan Krochalis in the above-captioned matter. I am over the age of 18 and have personal knowledge of the information contained in this declaration. I am

competent to testify.

2. I make this declaration in support of defendant Logan Krochalis's unopposed motion for extension of time to respond to plaintiff's Amended Complaint in this matter.

3. The claims against defendant Krochalis in this matter involve ten separate causes of action arising under federal and state law, including alleged violation of Section 1983 under multiple legal theories, violation of Americans with Disabilities Act, breach of confidentiality, and intentional infliction of emotional distress. The claims involve complex legal issues. Plaintiff seeks both money damages and injunctive relief.

4. I have conferred with plaintiff Mareesa Barrett who is representing herself in this matter, regarding this request for extension of time. Ms. Barrett does not oppose defendant Krochalis's request for a 30 day extension of time to file an answer or motions against her Amended Complaint in this matter from April 9, 2025, to May 9, 2025.

5. The request is to allow me additional time to analyze plaintiff's claims, to allow the parties to confer on potential motions against the Amended Complaint, and for me to prepare motions on any issues that are not resolved.

6. In addition, the parties are conferring regarding a stipulated protective order as the underlying case arises out of a juvenile proceeding in Multnomah County Circuit Court, State of Oregon.

7. This motion is made in good faith and is not for the purpose of delay.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: April 8, 2025.

By: /s/ Sheri C. Browning
Sheri C. Browning

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of April, 2025, I served the foregoing
DECLARATION OF SHERI C. BROWNING IN SUPPORT OF UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT BY
DEFENDANT LOGAN KROCHALIS on the following parties:

Mareesa M. Barrett
310 SW 2nd Street, Unit 1526
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Plaintiff Pro Se

Natalie M. Fisher
Dirk L. Pierson
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Of Attorneys for Defendants

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system on the date set forth above;
- ☒ by **emailing** a copy thereof to each attorney at each attorney's last-known email address on the date set forth above;
- ☒ by **mailing** a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to plaintiff's last-known address listed above and depositing it in the U.S. mail at Portland, Oregon on the date set forth above.

By: /s/ Sheri C. Browning
Sheri C. Browning